

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

In re:

Glyn Neal Owen

Debtor.

Chapter 11

No. 25-11132-KHK

MOTION FOR ADMISSION PRO HAC VICE

Samantha L. Brooks (“Movant”), a member in good standing of the Virginia State Bar, an attorney duly admitted to practice before the U.S. Bankruptcy Court for the Eastern District of Virginia, moves the Court, pursuant to Local Rule 2090-1(E)(3) of the Local Rules for the U.S. Bankruptcy Court for the Eastern District of Virginia (the “Motion”), for the entry of an Order authorizing James Michael Sullivan (“Mr. Sullivan”), an attorney with the law firm of Seyfarth Shaw, LLP to appear and practice *pro hac vice* before this Court on behalf of The Prudential Insurance Company in the above-captioned bankruptcy proceedings and any related or associated proceedings. In support of the Motion, the Movant states as follows:

1. Mr. Sullivan is a member of the bar of the District of Columbia. He is admitted to practice before the United States Supreme Court, United States Courts of Appeals for the Second, Third, and Federal Circuits, and the United States District Courts for the District of New Jersey, Eastern and Southern Districts of New York, District of Connecticut, Southern District of Indiana, and Southern District of Texas. There are no pending disciplinary proceedings against Mr. Sullivan.

2. Local Rule 2090-1(E)(3) provides that “an attorney from another state, the District of Columbia or a territory of the United States may appear and practice in cases *pro hac vice* before this Court upon a motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar. Applicants for *pro hac vice* admission shall complete a written application, which shall be appended to and incorporated by reference in the aforesaid motion.” **Exhibit A**, attached hereto, is a completed Application required by Local Rule 2090-1(E)(3)(a).

3. Movant requests that the Court authorize Mr. Sullivan to appear at hearings in the above-captioned proceedings and practice before this Court in those proceedings.

4. Movant has provided notice of this Motion to all persons that receive CM/ECF notice in this bankruptcy case, including the Office of the U.S. Trustee, Chapter 13 Trustee, and counsel for the Debtor.

WHEREFORE, Movant requests that the Court enter an order, substantially in the form of **Exhibit B**, attached hereto, authorizing Mr. Sullivan to appear and practice *pro hac vice* on behalf of The Prudential Insurance Company and granting such other relief that the Court deems proper.

Respectfully submitted this 2nd day of February, 2026.

Dated: February 2, 2026

Respectfully submitted,

/s/ Samantha L. Brooks
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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February 2026, the foregoing MOTION FOR PRO HAC VICE was filed and served upon all parties and counsel of record:

/s/ Samantha L. Brooks

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